American Disposal Co., Inc. PO Box 399 Puyallup, WA 98371

September 15, 2011

Mr. David W. Danner Executive Director and Secretary Attn: Records Section Washington Utilities and Transportation Commission 1300 S Evergreen Park Dr SW Olympia WA 98504-7250

RE: Annual Commodity Credit Adjustments/Revenue Share Retention 2011-2012 for American Disposal Co., Inc. G-87.

Dear Mr. Danner:

As authorized by RCW 81.77.185, American Disposal is seeking joint approval from Pierce County and the Washington Utilities and Transportation Commission (UTC) to retain 50% of the commodity value for the 2011-2012 plan year (November 1, 2011 – October 31, 2012). This year's revenue sharing plan will enable or require the following:

- American Disposal agrees to continue to promote waste reduction by encouraging new and existing customers to utilize the larger 96-gallon recycling cart.
- American Disposal will provide annual information, by way of bill inserts, regarding solid waste, recycling and yard waste collection and emphasize the importance of waste reduction.
- American Disposal will work with management of Multi-family establishments to reduce contaminants.
- American Disposal will continue to follow-up with apartment complexes, using compactors for solid waste, which currently do not recycle or do not have adequate space allocated for recycling equipment to encourage recycling and plans to emphasize, in conjunction with a new county sustainability coordinator position (which Murrey's is assisting funding), the importance of increasing multi-family recycling participation.
- American Disposal will continue to participate in regional meetings, city councils, trade associations such as WRRA, WSRA and others discussing strategies for increasing recycling in our state.
- American Disposal will continue monthly reporting of a myriad of recycling, yard waste and solid waste tonnage customer data to Pierce County.

In addition, the recycling program was updated and modified in 2010 to include the following which will continue into the next reporting year:

• Customer Service Representatives will promote customers use of lower levels of solid waste

service during routine phone calls, and especially when a customer is setting up new service or is changing their current service level for solid waste, recycling and/or yard debris collection.

- The Company will continually modify the customer notifications on invoices in an ongoing effort to clarify changes in pricing for solid waste, recycling and/or yard debris.
- The Company will increase the number of glass drop-off sites in Pierce County as agreed upon with the County.
- The Company will enhance its existing on-line website. The enhanced website will be updated and revised on an ongoing basis.

The commodity markets have substantially recovered from the economic slowdown although those markets remain precarious and subject to reversal based on current market circumstances as witnessed by high unemployment and skittish consumer behavior. We continue to believe that our revenue share program has been well received in the community and, in partnership with Pierce County, are committed to the original legislative goals initially articulated in 2002 and reaffirmed in 2010 of transforming the solid waste stream. We are thus requesting permission to continue the revenue share portion of the agreement and retain up to fifty percent of the revenue from commodity sales towards increasing recycling.

If you have any questions, please contact me at (360) 832-8749, or via email at irmgardw@wasteconnections.com.

Sincerely,

Irmgard Wilcox Senior Pricing Manager